

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (SPRINGFIELD)

ACCESS 4 ALL, INC., a Not for Profit
Corporation, and FELIX ESPOSITO,
Individually,

Case No. 3:04-cv-12347-KPN

Plaintiffs,

v.

DELANCEY CLINTON ASSOCIATES, L.P., a
Pennsylvania Limited Partnership,

Defendant.

**PLAINTIFFS' MOTION TO ALLOW PLAINTIFFS TO SUPPLEMENT PLAINTIFFS'
VERIFIED APPLICATION FOR ATTORNEYS' FEES, LITIGATION EXPENSES AND
COSTS AND INCORPORATED MEMORANDUM OF LAW IN SUPPORT THEREOF**

COME NOW the Plaintiffs, by and through their undersigned attorneys, and move this Court to allow the Plaintiffs to Supplement Plaintiffs' Verified Application for Attorney's Fees, Litigation Expenses and Costs and as grounds therefor state:

1. On July 7, 2006, Plaintiffs filed a Verified Application for Attorneys' Fees, Litigation Expenses and Costs to include the additional legal services rendered in this case from the filing of the initial application for fees [DE 36].
2. Since that time of the filing of that motion, a significant amount of legal services have been required by Plaintiffs' counsel in this matter, which the Plaintiffs contend are reasonable, necessary and are recoverable.
3. The supplemental request for additional fees and costs is as outlined below:

The following additional services were performed by John Fuller:

8/16/06	Reviewed Defendant's Opposition to Plaintiffs's Verified Application for Attorneys' Fees, Costs and Expert's Fees and Accompanying Memorandum of Law; Researched relevant law; Drafted Motion for Leave of Court to Respond to Defendant's Opposition; Discussed matter with opposing counsel; Starting drafting Plaintiffs' Response.	3.75
8/17/06	Continued drafting Plaintiffs' Response and performing accompanying research.	2.75
8/21/06	Continued drafting Plaintiffs' Response and performing accompanying research.	4.00
8/23/06	Continued drafting Plaintiffs' Response and performing accompanying research; Drafted Motion to Supplement Application for Fees	2.0

The additional legal services total 12.5 hours performed by John Fuller at the rate of \$325 per hour for a total of \$4,062.50.

Accordingly, Plaintiffs request the Court to supplement Plaintiffs' Application For Attorneys' Fees, Litigation Expenses and Costs to include the additional \$4,062.50, therefore, the total amount sought by the Plaintiffs is \$34,737.00 for attorneys' fees, \$6,737.50 for expert's fees, and \$2,945.99 for costs.

No prejudice results to the Defendant as a result of this Motion.

CERTIFICATE OF CONFERENCE

Plaintiffs' counsel left a message for Defendant's counsel regarding this Motion and have not yet communicated. Plaintiffs' and Defendant's counsel have attempted to, but have been unable to agree on the issues of attorneys' fees, costs and expert's fees in this case.

Respectfully submitted,

/s/John P. Fuller

JOHN P. FULLER, Esq., pro hac vice
FL Bar No. 0276847

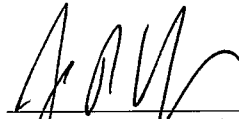
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VERIFICATION

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

BEFORE ME, the undersigned authority, personally appeared this day JOHN P. FULLER who acknowledged to and before me that he executed the foregoing Motion to Supplement Plaintiffs' Verified Application for Attorneys' Fees, Litigation Expenses and Costs and Incorporated Memorandum of Law for the purposes contained therein and the facts alleged therein are true to the best of their knowledge and belief.

WITNESS my hand and seal in the County and State last aforesaid this 23rd day of August, 2006.



John P. Fuller


NOTARY PUBLIC



CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to Michael Colgan Harrington, Esq., Murtha Cullina, LLP, 185 Asylum Street, CityPlace I, Hartford, CT 06103 on this 23 day of August 2006.

/s/John P. Fuller

JOHN P. FULLER, Esq., pro hac vice